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MDALGORITHMMS, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

LA CANADA VENTURES, INC.,

Plaintiff and  
Counterdefendant,

v.

MDALGORITHMMS, INC.,

Defendant and Counterclaimant.

Case No. 22-cv-07197 RS

**ANSWER TO SECOND AMENDED  
COMPLAINT; COUNTERCLAIM**

Honorable Richard Seeborg

Defendant and Counterclaimant MDalgorithms, Inc. (“MDalgorithms”), by and through its counsel of record below, hereby responds to the Second Amended Complaint of Plaintiff La Canada Ventures, Inc. (“La Canada”), as follows:

**NATURE OF THE ACTION**

1. Answering the allegations of Paragraph 1, MDalgorithms denies the allegations.

**THE PARTIES**

2. Answering the allegations of Paragraph 2, MDalgorithms is informed and believes that La Canada is a California corporation having its principal place of business in San Mateo, California.

3. Answering the allegations of Paragraph 3, MDalgorithms admits that it is a Delaware corporation with headquarters at 22 Shlomzion Hamalka Street, Herzliya, Israel 4662. MDalgorithms denies the remaining allegations of Paragraph 3.

#### **JURISDICTION AND VENUE**

4. Answering the allegations of Paragraph 4, MDalgorithms admits the allegations.

5. Answering the allegations of Paragraph 5, MDalgorithms admits the allegations.

6. Answering the allegations of Paragraph 6, MDalgorithms admits the allegations.

#### **LA CANADA AND ITS MARKS**

7. Answering the allegations of Paragraph 7, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

8. Answering the allegations of Paragraph 8, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

9. Answering the allegations of Paragraph 9, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

10. Answering the allegations of Paragraph 10, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

11. Answering the allegations of Paragraph 11, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

12. Answering the allegations of Paragraph 12, MDalgorithms denies the allegations.

13. Answering the allegations of Paragraph 13, MDalgorithms denies the allegations.

#### **MDALGORITHMS AND ITS ALLEGED INFRINGING ACTIVITY**

14. Answering the allegations of Paragraph 14, MDalgorithms admits that it offers a treatment system, utilizing computer technology, to diagnose potential treatments. MDalgorithms denies the remaining allegations of Paragraph 14.

15. Answering the allegations of Paragraph 15, MDalgorithms admits that it registered “MDacne” with the United States Patent and Trademark Office, that such registration was assigned Registration No. 4946004, that such registration is for “Computer software and downloadable computer software for education and advice in the field of the care and treatment of

1 skin disorders, namely, acne” in Class 9 and for “Providing a website featuring information and  
 2 advice in the field of the diagnosis and treatment of disorders, namely, acne” in Class 41, and that  
 3 such registration asserts a first-use date of May 16, 2010. MDalgorithms denies the remaining  
 4 allegations of Paragraph 15.

5 16. Answering the allegations of Paragraph 16, MDalgorithms admits that it registered  
 6 “MDacne” with the United States Patent and Trademark Office, that such registration was  
 7 assigned Registration No. 5,519,511, that such registration is for “Medicated skin treatment and  
 8 cleansing creams” in Class 5, and that such registration asserts a first-use date of May 16, 2010.  
 9 MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the  
 10 remaining allegations, and therefore denies same.

11 17. Answering the allegations of Paragraph 17, MDalgorithms admits that it registered  
 12 “MDhair” with the United States Patent and Trademark Office on the Supplemental Register, that  
 13 such registration was assigned Registration No. 6,617,014, and that such registration is for  
 14 “providing temporary use of on-line non-downloadable computer software for education and  
 15 advice in the field of the care and treatment of skin and hair” in Class 42. MDalgorithms lacks  
 16 knowledge or information sufficient to form a belief as to the truth of the remaining allegations,  
 17 and therefore denies same.

18 18. Answering the allegations of Paragraph 18, MDalgorithms admits that it filed an  
 19 intent-to-use trademark application for “MDskin”, that such application was for “downloadable  
 20 mobile software for use in analyzing a user’s skin and preparing a personalized treatment plan” in  
 21 Class 9, and that in a June 24, 2021 response to the USPTO it listed a La Canada registration as  
 22 one of many cited examples of third-party uses of MD-formative marks for personal care products,  
 23 including beauty and cosmetic care. MDalgorithms lacks knowledge or information sufficient to  
 24 form a belief as to the truth of the remaining allegations, and therefore denies same.

25 19. Answering the allegations of Paragraph 19, MDalgorithms admits the allegations.

26 20. Answering the allegations of Paragraph 20, MDalgorithms admits that it registered  
 27 the mark “MDacne” for “non-medicated skincare preparations” in Class 3 and that it asserted a  
 28

first-use date of November 21, 2021. MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies same.

21. Answering the allegations of Paragraph 21, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

22. Answering the allegations of Paragraph 22, MDalgorithms admits the allegation that “MD” is commonly understood in certain contexts to mean “Doctor of Medicine.”

MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies same.

23. Answering the allegations of Paragraph 23, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

24. Answering the allegations of Paragraph 24, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

25. Answering the allegations of Paragraph 25, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies same.

26. Answering the allegations of Paragraph 26, MDalgorithms denies the allegations.

#### **MDALGORITHMS’ ALLEGED WILLFUL DISREGARD OF ACTUAL CONFUSION**

27. Answering the allegations of Paragraph 27, MDalgorithms admits that it received a letter from La Canada alleging indications of actual confusion, that La Canada requested that MDalgorithms cease use of certain trademarks, and that MDalgorithms responded to La Canada’s letter. MDalgorithms denies that any evidence of “actual confusion was brought to MDalgorithm’s attention” by La Canada and the remaining allegations.

28. Answering the allegations of Paragraph 28, MDalgorithms denies that La Canada “continued to experience actual confusion.” MDalgorithms admits that La Canada nonetheless reported alleged infringement to Amazon.com and Apple regarding MDalgorithms’ products and app in an attempt to interfere with and harm MDalgorithms’ business.

29. Answering the allegations of Paragraph 29, the allegations do not sufficiently identify the “subsequent letter” at issue, and MDalgorithms accordingly lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and denies same.

30. Answering the allegations of Paragraph 30, MDalgorithms admits that it sells certain products without an additional treatment system. MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and denies same.

31. Answering the allegations of Paragraph 31, MDalgorithms denies the existence of any actual confusion. MDalgorithms admits the allegations that it raised certain legal claims as to La Canada in response to La Canada falsely reporting claims of actual confusion and infringement to third parties concerning MDalgorithms.

### COUNT I – FEDERAL TRADEMARK INFRINGEMENT

32. Answering the allegations of Paragraph 32, MDalgorithms repeats and realleges its responses to the allegations in Paragraphs 1-31 of the Complaint as though fully set forth herein.

33. Answering the allegations of Paragraph 33, MDalgorithms denies the allegations.

34. Answering the allegations of Paragraph 34, MDalgorithms admits that La Canada is the listed owner of the cited trademark registrations. MDalgorithms denies the remaining allegations.

35. Answering the allegations of Paragraph 35, MDalgorithms admits that La Canada has filed a Section 15 affidavit as to Registration No. 4,471,494. MDalgorithms denies the remaining allegations as to Registration 4,471,494. MDalgorithms lacks knowledge or belief as to which additional registrations La Canada is specifically referencing in this Paragraph 35, and accordingly denies such allegations.

36. Answering the allegations of Paragraph 36, MDalgorithms denies the allegations.

37. Answering the allegations of Paragraph 37, MDalgorithms denies the allegations.

38. Answering the allegations of Paragraph 38, MDalgorithms admits that it uses MDhair and MDacne concerning its products. Except as expressly admitted, MDalgorithms denies the remaining allegations.

39. Answering the allegations of Paragraph 39, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and denies same.

40. Answering the allegations of Paragraph 40, MDalgorithms denies the allegations.

1 41. Answering the allegations of Paragraph 41, MDalgorithms denies the allegations.

2 42. Answering the allegations of Paragraph 42, MDalgorithms denies the allegations.

3 43. Answering the allegations of Paragraph 43, MDalgorithms denies the allegations.

4 44. Answering the allegations of Paragraph 44, MDalgorithms denies the allegations.

5 45. Answering the allegations of Paragraph 45, MDalgorithms denies the allegations.

6 **COUNT II – UNFAIR COMPETITION**

7 46. Answering the allegations of Paragraph 46, MDalgorithms repeats and realleges its  
 8 responses to the allegations in Paragraphs 1-45 of the Complaint as though fully set forth herein.

9 47. Answering the allegations of Paragraph 47, MDalgorithms denies the allegations.

10 48. Answering the allegations of Paragraph 48, MDalgorithms denies the allegations.

11 49. Answering the allegations of Paragraph 49, MDalgorithms denies the allegations.

12 50. Answering the allegations of Paragraph 50, MDalgorithms admits that it uses  
 13 MDhair and MDacne concerning its products. Except as expressly admitted, MDalgorithms  
 14 denies the remaining allegations.

15 51. Answering the allegations of Paragraph 51, MDalgorithms denies that it is  
 16 infringing any claimed rights owned by La Canada and lacks knowledge or information sufficient  
 17 to form a belief as to the truth of the remaining allegations, and denies same.

18 52. Answering the allegations of Paragraph 52, MDalgorithms denies the allegations.

19 53. Answering the allegations of Paragraph 53, MDalgorithms denies the allegations.

20 54. Answering the allegations of Paragraph 54, MDalgorithms denies the allegations.

21 55. Answering the allegations of Paragraph 55, MDalgorithms denies the allegations.

22 56. Answering the allegations of Paragraph 56, MDalgorithms denies the allegations.

23 57. Answering the allegations of Paragraph 57, MDalgorithms denies the allegations.

24 **COUNT III – CANCELLATION OF REGISTRATION**

25 58. Answering the allegations of Paragraph 58, MDalgorithms repeats and realleges its  
 26 responses to the allegations in Paragraphs 1-57 of the Complaint as though fully set forth herein.

27 59. Answering the allegations of Paragraph 59, MDalgorithms denies the allegations.

60. Answering the allegations of Paragraph 60, MDalgorithms admits that La Canada is the listed owner of the cited trademark registrations. MDalgorithms denies the remaining allegations.

61. Answering the allegations of Paragraph 61, MDalgorithms admits that La Canada has filed a Section 15 affidavit as to Registration No. 4471494. MDalgorithms lacks knowledge or belief as to which additional registrations La Canada is specifically referencing in this Paragraph 61, and accordingly denies such allegations. MDalgorithms denies the remaining allegations as to Registration 4471494.

62. Answering the allegations of Paragraph 62, MDalgorithms denies the allegations.

63. Answering the allegations of Paragraph 63, MDalgorithms denies the allegations.

64. Answering the allegations of Paragraph 64, MDalgorithms admits that U.S. Reg. No. 6,668,393 for the mark “MDacne” issued to MDalgorithms on or about March 8, 2022. MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and denies same

65. Answering the allegations of Paragraph 65, MDalgorithms denies the allegations.

66. Answering the allegations of Paragraph 66, MDalgorithms denies the allegations.

67. Answering the allegations of Paragraph 67, MDalgorithms denies the allegations.

68. Answering the allegations of Paragraph 68, MDalgorithms admits the existence of its “MDacne” registrations provides it a presumptive right to use the mark in commerce. MDalgorithms denies the remaining allegations.

69. Answering the allegations of Paragraph 69, MDalgorithms denies the allegations.

#### **COUNT IV – DECLARATION THAT LA CANADA’S CONDUCT IS LAWFUL**

70. Answering the allegations of Paragraph 70, MDalgorithms repeats and realleges its responses to the allegations in Paragraphs 1-69 of the Complaint as though fully set forth herein.

71. Answering the allegations of Paragraph 71, MDalgorithms admits the allegations.

72. Answering the allegations of Paragraph 72, MDalgorithms denies the allegation that actual confusion has occurred as result of any conduct by MDalgorithms, and alleges that to the extent any confusion has occurred, it is due to La Canada’s improper and unlawful acts.



MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and denies same.

73. Answering the allegations of Paragraph 73, MDalgorithms admits that it has accused La Canada of acting improperly by making false reports of actual confusion and infringement, and that as a result MDalgorithms has indicated it will pursue certain claims against La Canada to defend itself. MDalgorithms denies the remaining allegations.

74. Answering the allegations of Paragraph 74, MDalgorithms denies the allegations.

75. Answering the allegations of Paragraph 75, MDalgorithms denies the allegations.

### **COUNT V – FALSE ADVERTISING CLAIM IN VIOLATION OF FEDERAL LAW**

76. Answering the allegations of Paragraph 76, MDalgorithms repeats and realleges its responses to the allegations in Paragraphs 1-75 of the Complaint as though fully set forth herein.

77. Answering the allegations of Paragraph 77, MDalgorithms admits that it offers products in association with MDacne and MDhair, and that it maintains the website mdacne.com and mdhair.co, through which it offers its products in interstate commerce via the internet. Except as expressly admitted herein, MDalgorithms denies the remaining allegations.

78. Answering the allegations of Paragraph 78, MDalgorithms lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the unidentified “statements of fact” and denies same.

79. Answering the allegations of Paragraph 79, MDalgorithms admits that it offers a customized treatment option based on customer input in response to an questionnaire provided by MDalgorithms, and that the recommended product is based in part on the customer input. Except as expressly admitted herein, MDalgorithms denies the remaining allegations of Paragraph 79.

80. Answering the allegations of Paragraph 80, MDalgorithms admits that it offers certain of its products with dermatologist support on how to use its products, and that such support includes a Board-certified Dermatologist, who is a Fellow of the American Academy of Dermatology. MDalgorithms further admits that all of its products are available over the counter and without a medical prescription. Except as expressly admitted herein, MDalgorithms denies the remaining allegations of Paragraph 80.



1           81.     Answering the allegations of Paragraph 81, MDalgorithms denies the allegations.  
 2           82.     Answering the allegations of Paragraph 82, MDalgorithms denies the allegations.  
 3           83.     Answering the allegations of Paragraph 83, MDalgorithms denies the allegations.  
 4           84.     Answering the allegations of Paragraph 84, MDalgorithms admits that La Canada  
 5 has misleadingly culled out alleged, unverified negative reviews of MDalgorithms from  
 6 trustpilot.com, which speak for themselves, and which reviews may be created with a simple email  
 7 account without further verification, in contrast to other verified review sites where MDalgorithms  
 8 has a rating of over 90% customer satisfaction, as evidenced by more representative samples of  
 9 such reviews, attached as **Exhibit A**. Except as expressly admitted herein, MDalgorithms denies  
 10 the allegations.

11           85.     Answering the allegations of Paragraph 85, MDalgorithms denies that La Canada  
 12 has received complaints from purchasers of MDalgorithms' MDhair products, unless La Canada  
 13 purposefully directed such MDalgorithms customers to itself. Except as expressly admitted  
 14 herein, MDalgorithms denies the remaining allegations.

15           86.     Answering the allegations of Paragraph 86, MDalgorithms denies the allegations.

16           87.     Answering the allegations of Paragraph 87, MDalgorithms denies the allegations.

17           88.     Answering the allegations of Paragraph 88, MDalgorithms lacks information and  
 18 belief as to whether La Canada "directly competes" with MDalgorithms, and denies the allegation.  
 19 MDalgorithms denies the remaining allegations herein.

20           89.     Answering the allegations of Paragraph 89, MDalgorithms denies the allegations.

21           90.     Answering the allegations of Paragraph 90, MDalgorithms denies the allegations.

22                   **COUNT VI – FALSE ADVERTISING CLAIM IN VIOLATION OF CALIFORNIA**  
 23                   **STATE LAW**

24           91.     Answering the allegations of Paragraph 91, MDalgorithms repeats and realleges its  
 25 responses to the allegations in Paragraphs 1-90 of the Complaint as though fully set forth herein.

26           92.     Answering the allegations of Paragraph 92, MDalgorithms admits that it offers  
 27 products in association with MDacne and MDhair, and that it maintains the website mdacne.com  
 28

1 and mdhair.co, through which it offers its products in interstate commerce via the internet. Except  
 2 as expressly admitted herein, MDalgorithms denies the remaining allegations.

3 93. Answering the allegations of Paragraph 93, MDalgorithms lacks knowledge or  
 4 information sufficient to form a belief as to the truth of the allegations regarding the unidentified  
 5 “statements of fact,” and denies same.

6 94. Answering the allegations of Paragraph 94, MDalgorithms admits that it offers a  
 7 customized treatment option based on customer input in response to an questionnaire provided by  
 8 MDalgorithms, and that the recommended product is based in part on the customer input. Except  
 9 as expressly admitted herein, MDalgorithms denies the remaining allegations of Paragraph 94.

10 95. Answering the allegations of Paragraph 95, MDalgorithms admits that it offers  
 11 certain of its products with dermatologist support on how to use its products, and that such support  
 12 includes a Board-certified Dermatologist, who is a Fellow of the American Academy of  
 13 Dermatology. MDalgorithms further admits that all of its products are available over the counter  
 14 and without a medical prescription. Except as expressly admitted herein, MDalgorithms denies  
 15 the remaining allegations of Paragraph 95.

16 96. Answering the allegations of Paragraph 96, MDalgorithms denies the allegations.

17 97. Answering the allegations of Paragraph 97, MDalgorithms denies the allegations.

18 98. Answering the allegations of Paragraph 98, MDalgorithms denies the allegations.

19 99. Answering the allegations of Paragraph 99, MDalgorithms admits that La Canada  
 20 has misleadingly culled out alleged, unverified negative reviews of MDalgorithms from  
 21 trustpilot.com, which speak for themselves, and which reviews may be created with a simple email  
 22 account without further verification, in contrast to other verified review sites where MDalgorithms  
 23 has a rating of over 90% customer satisfaction, as evidenced by La Canada’s own document and  
 24 more representative samples of such reviews concerning the overwhelmingly positive consensus  
 25 regarding MDalgorithms, attached as **Exhibit A**. Except as expressly admitted herein,  
 26 MDalgorithms denies the remaining allegations.

27 100. Answering the allegations of Paragraph 100, MDalgorithms denies that La Canada  
 28 has received complaints from purchasers of MDalgorithms’ MDhair products, unless La Canada

purposefully directed such MDalgorithms' customers to itself. Except as expressly admitted herein, MDalgorithms denies the remaining allegations.

101. Answering the allegations of Paragraph 101, MDalgorithms denies the allegations.

102. Answering the allegations of Paragraph 102, MDalgorithms denies the allegations.

103. Answering the allegations of Paragraph 103, MDalgorithms lacks information and belief as to whether La Canada "directly competes" with MDalgorithms, and denies the allegation. MDalgorithms denies the remaining allegations herein.

104. Answering the allegations of Paragraph 104, MDalgorithms denies the allegations.

105. Answering the allegations of Paragraph 105, MDalgorithms denies the allegations.

106. Answering the allegations of Paragraph 106, MDalgorithms denies the allegations.

107. Answering the allegations of Paragraph 107, MDalgorithms denies the allegations.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE (Unclean Hands)**

108. La Canada is precluded from the requested relief because it has acted with unclean hands.

#### **SECOND AFFIRMATIVE DEFENSE (Lack of Protectable Marks)**

109. The relevant marks allegedly proprietary to La Canada, as asserted in the Complaint, are not protectable as a matter of law.

#### **THIRD AFFIRMATIVE DEFENSE (Balance of Hardships)**

110. La Canada's requested injunction is not warranted by the balance of hardships.

#### **FOURTH AFFIRMATIVE DEFENSE (No Damages)**

111. La Canada's claims fail in whole or in part because it has not suffered any damages.

**FIFTH AFFIRMATIVE DEFENSE**  
**(No Likelihood of Confusion)**

112. La Canada's claims fail in whole or in part because, to the extent it has any protectable trademark rights, such rights are so thin and narrow in such a crowded field of descriptive uses that no such confusion is likely with MDalgorithms or any of the countless third parties who utilize a mark with MD in combination with other terms.

**SIXTH AFFIRMATIVE DEFENSE**  
**(Failure to Police)**

113. La Canada lacks the ability to seek enforce its purported trademark rights in "composite marks based on the root MD in combination with other terms" because of its failure to police such alleged rights.

**SEVENTH AFFIRMATIVE DEFENSE**  
**(Lack of Secondary Meaning)**

114. The claims made in the Second Amended Complaint are barred, in whole or in part, on the basis that certain of La Canada's claimed trademarks lack secondary meaning.

**ADDITIONAL DEFENSES**

115. MDalgorithms reserves the right to assert additional defenses based on information learned or obtained during discovery.

WHEREFORE, MDalgorithms prays for judgment against La Canada as follows:

1. That La Canada take nothing by way of the Second Amended Complaint;
2. The Second Amended Complaint, and each and every purported claim for relief therein, be dismissed with prejudice;
3. That judgment be entered in favor of MDalgorithms;
4. That MDalgorithms be awarded its reasonable attorneys' fees and costs of suit as incurred; and
5. For such other and further relief as the Court may deem just and proper.

**COUNTERCLAIM**

Defendant/Counterclaimant MDalgorithms, Inc. (“MDalgorithms”), for its Counterclaim against Plaintiff/Counterclaim Defendant La Canada Ventures, Inc. (“La Canada”), alleges as follows:

1. La Canada is unfairly and unlawfully competing against MDalgorithms by purposefully utilizing MDalgorithms’ own marks, only after MDalgorithms began use of such marks, to create the false belief that La Canada makes MDalgorithms’ products. For example, it was only after learning of MDalgorithms’ use of MDhair that La Canada took affirmative measures to utilize the URL [www.mdhair.com](http://www.mdhair.com) to lure in to La Canada’s website those customers searching for MDalgorithms’ MDhair products. La Canada did not and does not offer a product named or labeled “MDhair” or “MD Hair,” nor had it marketed or promoted its goods as being available at mdhair.com at any time prior to MDalgorithms’ launch of its MDhair products. Similarly, it was only after learning of MDalgorithms’ use of MDacne that La Canada took affirmative measures to begin promoting its skincare products using the mark “MD acne” despite the fact that La Canada did not and does not offer a product named or labeled “MDacne” Or “MD acne,” nor had La Canada marketed or promoted its goods under the “MD acne” mark prior to MDalgorithms’ launch of its MDacne products. La Canada has purposefully sought to use MDalgorithms’ own marks, which are distinct from La Canada’s MD-formative trademarks in a very crowded field, to deceive MDalgorithms’ customers and to cause harm to MDalgorithms.

**JURISDICTION AND VENUE**

2. The Court has original jurisdiction over this action pursuant to 15 U.S.C. § 1131 and 28 U.S.C. §§ 1331 and 1338.

3. This Court has personal jurisdiction over La Canada because it resides in this district, regularly conducts business in this district, and MDalgorithms’ counterclaims arise out of business conducted in this district.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391, by reason of La Canada’s business practices in this district, and by reason of La Canada’s Second Amended Complaint in this action

**THE PARTIES**

5. Counterclaimant MDalgorithms, Inc. is a Delaware corporation with its principal place of business at 22 Shlomzion Hamalka Street, Herzliya, Israel 4662.

6. Upon information and belief, Counterclaim Defendant La Canada Ventures, Inc. is a California corporation with its principal place of business at 448 N. San Mateo Drive, San Mateo, California 94401.

**FACTUAL BACKGROUND**

7. Counterclaimant MDalgorithms, Inc. was founded by Yoram Harth, M.D., a world-renowned dermatologist and specialist, and CEO Oded Harth, a technological innovator who was named to Forbes 30 Under 30. MDalgorithms offers skincare and hair care products and services online under the names MDacne (beginning in 2017) and MDhair (beginning in 2021), respectively.

8. MDalgorithms distinguishes itself from its competitors by selling its products through personalization. It utilizes its proprietary technology applying image analysis and AI to customize treatment kits for customers based on the customer's specific needs, via its MDacne mobile app (available via the App Store and Play Store), and at MDacne.com and MDhair.co.

9. The majority of MDalgorithms' customers begin the sales cycle by completing a quiz and submitting photographs of their skin or scalp before there is any commitment to purchase. MDalgorithms' AI-based software analyzes the customer information and images to personalize the products based on that specific customer need and profile, which the customer may then elect to purchase for shipment.

10. The overwhelming majority of MDalgorithms' sales of goods and services under MDacne come via the MDacne app and its corresponding website, mdacne.com. For roughly the past six years, MDalgorithms has sold a very high volume of goods and services under its MDacne mark, based on numerous transactions.

11. MDalgorithms owns Registration No. 4946004 for the mark MDacne, which issued on April 26, 2016, for "Computer software and downloadable computer software for education and advice in the field of care and treatment of skin disorders, namely, acne" in Class 9 and

1 “Providing a website featuring information and advice in the field of the diagnosis and treatment  
 2 of acne” in Class 41. It also owns additional registrations for the mark MDacne, namely, (a)  
 3 Registration No. 5519511, which issued on July 17, 2018, for “Medicated skin treatment and  
 4 cleansing creams” in Class 5, and (b) Registration No. 6668393, which issued on August 14, 2021,  
 5 for “Non-medicated skin care preparations.” All of the above registrations are on the Principal  
 6 Register.

7 12. MDalgorithms’ MDhair products and services are currently offered exclusively at  
 8 MDalgorithms’ website, mdhair.co. Since 2021, MDalgorithms has sold a high volume of goods  
 9 and service under its MDhair mark

10 13. MDalgorithms owns Registration No. 6617014 for the mark MDhair, which issued  
 11 on January 11, 2022, for “Providing temporary use of on-line non-downloadable computer  
 12 software for education and advice in the field of the care and treatment of skin and hair” and this  
 13 registration is on the Supplemental Register.

14 14. When MDalgorithms began offering its MDhair products and services on  
 15 mdhair.co in 2021, the website mdhair.com was dormant and listed as available for sale.

16 15. In March 2023, La Canada filed a Complaint against MDalgorithms, alleging that  
 17 the latter’s use of MDacne and MDhair was infringing La Canada’s “MD-based marks for  
 18 products that directly compete with those offered by La Canada.” Tellingly, in its Complaint La  
 19 Canada did not assert that it used or otherwise attempted to commercialize the terms “MDhair” or  
 20 “MDacne.” Rather, La Canada’s allegation is that MDalgorithms’ use of MDacne and MDhair is  
 21 infringing other marks purportedly owned by La Canada which are “based on the root MD in  
 22 combination with the other terms.”

23 16. However, La Canada’s attempt to monopolize the term “MD” for health and  
 24 cosmetic products is inconsistent with the crowded field of third-party uses utilizing “the root MD  
 25 in combination with other terms” to signal to consumers that such personal care products have  
 26 some affiliation or recommendation from an MD, or Doctor of Medicine.

27 17. Indeed, as the United States Patent and Trademark Office (“USPTO”) previously  
 28 found, in rejecting La Canada’s attempt to register another MD-formative mark:



1 [T]he wording ‘MD’ is commonly used in the cosmetic preparations and  
2 supplement industries to notify the consumer that the goods are created by  
3 and/or recommended by medical doctors. Thus, the wording ‘MD’ in the  
4 applied-for mark merely describes a characteristic or feature of the goods

5 18. The USPTO’s determination is further confirmed by evidence of not just numerous  
6 third-party trademark applications and registrations for such personal care product uses “based on  
7 the root MD in combination with other terms,” but actual evidence of such third-party uses (a  
8 small sampling of which is detailed below):



LAW OFFICES  
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SAN FRANCISCO, CALIFORNIA 94111-3711

Professional Skin Rejuvenation



MD  
alchemy  
BY CALKIN & BOUDREAUX

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Powerful microdermabrasion resurfacing ingredients remove dead cells and debris from the skin's surface to reduce fine lines and wrinkles and diminish the appearance of hyperpigmentation. Each use improves skin tone, texture and elasticity, as non-abrasive exfoliation from pumice granules smooth dull, dry skin to a healthy, radiant finish.

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MD FORMULATIONS

**MD FORMULATIONS Continuous Renewal Complex, 1.7 oz (37919)**

★★★★☆ 1 review

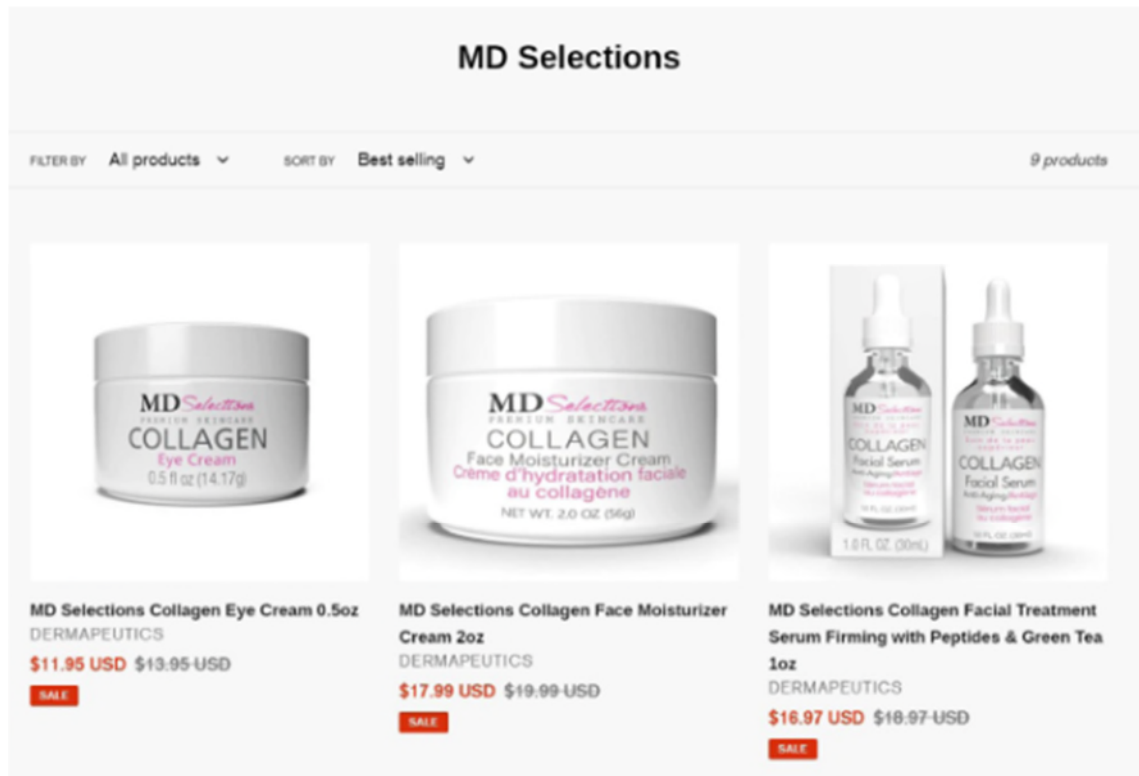
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**Beverly Hills MD Dermal Repair Complex- Tighten Skin & Reduce Wrinkles, Anti-Aging Supplement for Smooth, Plump Skin- Hyaluronic Acid, Hydrolyzed Collagen, Saw Palmetto, Vitamins A,B, MSM- 60 Capsules**

Brand: Beverly Hills MD  
3.8 ★★★★★ 2,723 ratings  
| 69 answered questions

**-15%** \$29<sup>00</sup> (\$0.48 / Count)

Typical price: ~~\$33.95~~

**FREE Returns**

Get \$100 off instantly: Pay \$0.00 upon approval for the Amazon Store Card.

1           19.       Notwithstanding that MDalgorithms, like numerous third parties, has long been  
 2 utilizing its own marks containing “the root MD in combination with other terms”, La Canada  
 3 asserts that it has experienced actual confusion concerning MDalgorithms. What La Canada has  
 4 not disclosed, however, is that it belatedly began to use the exact terms “MDacne” and “MDhair”  
 5 after MDalgorithms’ use of these terms.

6                                   **LA CANADA’S DECEITFUL ACTS RE MDHAIR**

7           20.       When MDalgorithms began using MDhair for its haircare products, and to sell  
 8 them exclusively at mdhair.co, La Canada offered a product named MD Nutri Hair, but it did not  
 9 offer a product named MDhair (or MD Hair), nor did it utilize the website mdhair.com for any  
 10 purpose (the website mdhair.com was inactive and listed for sale). However, after learning of  
 11 MDalgorithms’ use of MDhair, La Canada purposefully began using mdhair.com to cause that  
 12 URL to automatically redirect to La Canada’s website, md-factor.com.

13           21.       As La Canada did not promote or otherwise market its use of mdhair.com, or any  
 14 product named or labeled MDhair, consumers looking for La Canada would have no reason to  
 15 type in “mdhair.com” in their search for La Canada. Rather, as La Canada knew, the only reason  
 16 consumers would have to go to mdhair.com is if they were in search of a product or company  
 17 referenced as MDhair. La Canada’s willful and deceitful use of mdhair.com, after being on notice  
 18 of MDalgorithms’ use of MDhair, deceived consumers looking for the manufacturer of MDhair to  
 19 instead visiting La Canada’s website.

20           22.       Once these customers were fraudulently diverted to La Canada, Counterclaim  
 21 Defendant, with the knowledge that such visitors were in the market for haircare products, sought  
 22 to sell its haircare products to these MDalgorithms’ customers it had misled to the La Canada  
 23 website.

24           23.       In one instance, after it had successfully redirected a customer attempting to locate  
 25 MDalgorithms, La Canada pleaded with the individual to “Please try to order our MD Nutri Hair  
 26 Supplements that are working for most of our customers. It is one of our hero products.”  
 27  
 28

24. On another occasion, La Canada advised a customer looking for MDalgorithms to “[p]lease check our MD Hair products line,” and La Canada further advised the individual to “please feel free to browse our website or let me know if you need assistance.”

25. MDalgorithms is accordingly informed and believes that La Canada made it a practice of attempting to convert MDalgorithms’ customers to purchase La Canada’s products once the customers were misdirected to La Canada’s website through the latter’s deceptive tactics regarding mdhair.com.

#### LA CANADA’S DECEITFUL ACTS RE MDACNE

26. Not content to fraudulently induce MDalgorithms’ customers with its use of MDhair, La Canada also sought to attract consumers looking for MDalgorithms’ MDacne products, again despite that fact that La Canada did not offer a product named MDacne or MDacne. La Canada engaged in this conduct only after learning of MDalgorithms’ use of MDacne.

27. By way of one example, La Canada offers a product named MD Complexion Factor Exfoliating Cleanser. The term “MD acne” or “acne” does not appear on the front label:





1           28.       As confirmed by the Wayback Machine, in July 2022 La Canada’s website  
2 description for the product labeled MD Complexion Factor Exfoliating Cleanser was “MD  
3 Complexion Factor Acne Cleanser.” However, after filing suit against MDalgorithms, and long  
4 after MDalgorithms had already been using the MDacne mark, La Canada purposefully changed  
5 its website description of the same product to “MD Acne Complexion Factor Acne Cleanser” – a  
6 blatant attempt to deceive those searching for MDalgorithms’ MDacne product:

LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

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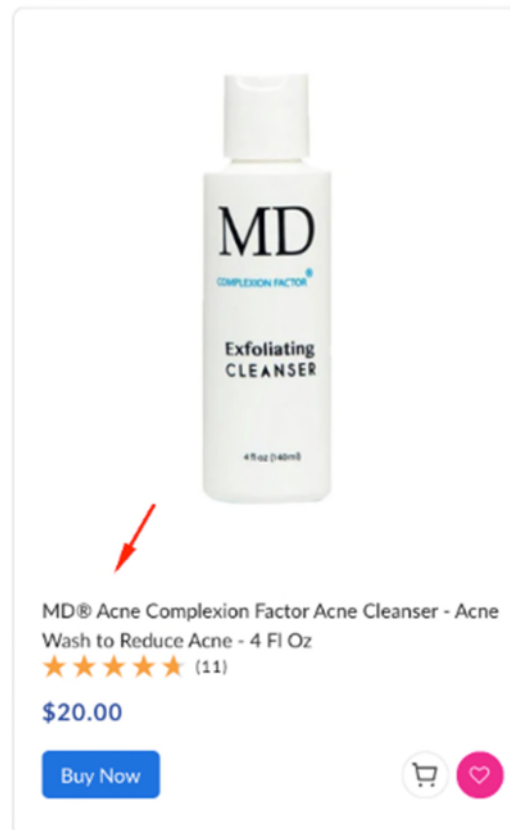


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SAN FRANCISCO, CALIFORNIA 94111-3711

Before (July 2022):



After (Current):



29. La Canada claims that its trademark rights are “based on the root MD” in “combination” with other terms. However, as noted above, the field of use of such MD-formative marks for personal care products is so incredibly crowded, and the scope of protection afforded such marks is accordingly so extensively narrow, that under these circumstances a party can be afforded protection only for a third-party use that is identical, or nearly identical.

30. La Canada’s knowing and purposeful attempts to utilize the identical terms MDacne and MDhair to deceive the general public for its own benefit, despite not offering a product named or labeled MDacne or MDhair, and only after becoming aware of MDalgorithms’ use of MDacne and MDhair, is improper and unlawful, in addition to a disingenuous attempt seeking to belatedly shoehorn these marks into La Canada’s claimed scope of trademark rights, all of which has damaged MDalgorithms.

**FIRST CAUSE OF ACTION**  
**(Common Law Unfair Competition)**

31. MDalgorithms realleges and incorporates by reference the allegations of Paragraphs 1 through 30.

32. MDalgorithms has continuously used the mark MDacne since at least 2017, and the mark MDhair since at least 2021.

33. MDalgorithms began use of MDacne and MDhair for its products prior to any claimed use of MDacne or MDhair by La Canada for its products.

34. La Canada became aware of MDalgorithms’ use of MDacne and MDhair for MDalgorithms’ products.

35. Upon learning of MDalgorithms’ use of MDacne and MDhair, La Canada began to deliberately use the identical MDacne and MDhair terms, such as for mdhair.com, intending to subjectively and knowingly confuse MDalgorithms’ customers with respect to the source of MDalgorithms’ products, notwithstanding that La Canada did not offer any products named or labeled “MD Acne” or “MD Hair.”

36. MDalgorithms’ customers were likely to be misled and were misled by La Canada’s deceptive acts.

1 37. La Canada's acts have deliberately misled the relevant customers into believing that  
2 its goods are those of MDalgorithms.

3 38. La Canada's actions caused and continue to cause MDalgorithms competitive  
4 injury, such as by diverting MDalgorithms' sales to La Canada.

5 39. MDalgorithms is therefore entitled to an award of damages and equitable relief  
6 concerning La Canada's conduct.

7  
8 **SECOND CAUSE OF ACTION**  
9 **(Unfair Competition in Violation of Cal. Bus. & Prof. Code Section 17200 et seq.)**

10 40. MDalgorithms realleges and incorporates by reference the allegations of  
11 Paragraphs 1 through 39.

12 41. La Canada's fraudulent business practices directing MDalgorithms' customers to  
13 La Canada, through La Canada's uses of MDhair and MDacne as referenced above, were intended  
14 to deceive the public at large, and were likely to deceive the public at large.

15 42. La Canada's fraudulent business practices in utilizing MDacne and MDhair to lure  
16 and deceive these customers did in fact deceive such customers, as they relied upon La Canada's  
17 misrepresentations, causing injury to MDalgorithms, and profits to La Canada through soliciting  
18 MDalgorithms' customers that La Canada intentionally misdirected.

19 43. La Canada's conduct, as alleged herein, constitutes unlawful, fraudulent, unethical,  
20 oppressive, and deceptive business practices under California Business and Professions Code  
21 Section 17200 *et seq.*

22 44. La Canada's conduct, as alleged herein, is likely to continue to mislead the general  
23 public and, consequently, constitutes a fraudulent business act or practice within the meaning of  
24 California Business & Professions Code Section 17200 *et seq.*

25 45. These unlawful acts by La Canada will continue to deceive the public, unless  
26 enjoined.

27 46. As a direct and proximate result of La Canada's unfair business practices as alleged  
28 herein, MDalgorithms has lost money and suffered injury in fact, and will continue to suffer

irreparable harm for which MDalgorithms does not have an adequate remedy at law, and therefore MDalgorithms is entitled to injunctive and such other relief.

### **PRAYER FOR RELIEF**

WHEREFORE, Defendant and Counterclaimant MDalgorithms, Inc. prays for the following relief:

A. For an Order that La Canada, and its agents, servants, employees, attorneys and any related companies, and all persons in active concert or participation with one or more of them, be preliminarily and permanently enjoined and restrained from unlawfully using the MDhair and MDacne designations in the manner described above;

B. For an Order requiring an accounting and that La Canada pay over to MDalgorithms all monetary gains, profits, and advantages derived by La Canada from the acts complained of herein;

C. For an Order disgorging from La Canada all ill-gotten profits gained as a result of La Canada's acts of unfair competition;

D. For an Order adjudging and declaring that La Canada's deceptive acts are willful;

E. For MDalgorithms' attorneys' fees;

F. For MDalgorithms' costs in this suit;

G. For prejudgment interest to the maximum extent recoverable by contract or law;

and

For such other relief as this Court may deem necessary or appropriate.

### **JURY TRIAL DEMANDED**

Counterclaimant MDalgorithms, Inc. requests a trial by jury for all issues so triable.

DATED: August 30, 2023

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Ian K. Boyd

Ian K. Boyd

Attorneys for Defendant and Counterclaimant  
MDALGORITHMS, INC.

# **Exhibit A**


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# MDhair

Reviews 124 • Average



3.6 ⓘ

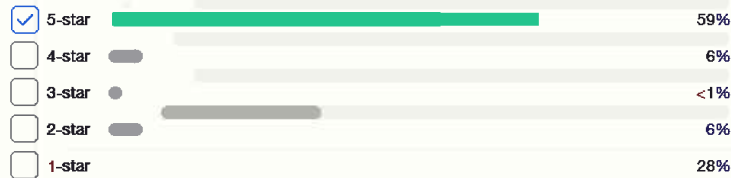
[mdhair.co](#)

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124 total


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TJ

Taal Joeng

2 reviews • US



Aug 22, 2023

### Affordable AND Effective

I took a chance on this brand because I figured it wouldn't be a huge loss if their eyebrow serum didn't work given the price. Not only is it more affordable than that popular brand's version, it genuinely works and maintains the new hair growth incredibly well. I'm excited to try out their other products. I highly recommend giving MDhair a try.

Date of experience: June 12, 2023

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ML

Madison Lynne

2 reviews • US



Aug 18, 2023

### You won't regret it.

MDhair is incredible!!!

Firstly. These products are amazing. And the customer care/service is top notch. Their products are also reasonably priced. Even better they actually WORK! You do a quick survey, questionnaire to see what would best suit you. They analyze it and give you recommendations. You can pick the best set for you and change which products to receive in your next shipment. They're products you use daily. And let me tell you. I don't even use mine everyday (I'm very forgetful at times or just in a rush) and for the

## Company activity

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Claimed profile



No verified details yet



Replied to 3 out of 41 negative reviews



Replies to negative reviews in &lt; 1 month

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## About MDhair

Information written by the company

A first-of-its-kind, patent-pending, customized growth solution developed by dermatologists. Forget about one-size-fits-all serums and medications. Your customized treatment kit will be designed to target the specific root causes of your hair loss, resulting in healthier, thicker hair.

## Contact

[support@mdhair.co](#)

548 Market St, #86774  
94104  
San Francisco  
United States

## Category ⓘ

[Hair Product Store](#)

The Trustpilot Experience

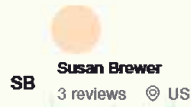
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results I'm seeing just from the short amount of time I've been using their products. Is phenomenal. Pregnancy killed my hair and MDhair is helping me get my confidence back. I saw new growth fairly quickly. I've tried other stuff before. Nothing is as good as MDhair.

Date of experience: August 18, 2023

Useful Share



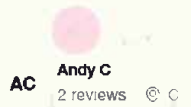
Aug 17, 2023

### Amazing, wonderful

Amazing, wonderful, helpful is what I have to say about this company. And the product, the same!  
I have used it for over a year and I had a little problem that they did back flips to make me happy.  
I seriously recommend this product (and the company)!! Their amazing!!!

Date of experience: August 04, 2023

Useful Share



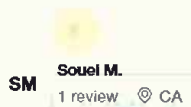
Aug 11, 2023

### Don't give up hope, until you have tried MDhair

After trying various hair growth and anti-thinning hair products to no avail, I almost gave up, then I found an ad by MDhair online. I decided to try it because it came as a kit that feeds your hair from the inside and also from the outside. you take the collagen and the hair vitamin (internally) then the shampoo and the hair serum for (external) use. I notice that where my hair was falling or thinning slowed down and I started to see new hair growth, and it's improving every day. My suggestion to anyone that is experiencing thinning hair or somehow whose hair is not as it once was is to give MDhair a try you will not regret it.

Date of experience: May 09, 2023

Useful 1 Share



Aug 6, 2023

### One of the best decisions I've made

One of the best decisions I've made! Was hesitant initially but glad I took the leap as it has made improvement to my hair, thus, to my self-confidence. Hair started looking more dense and I only just started too! MDHair has been very helpful with my questions about the treatment. Definitely recommended!

Date of experience: August 06, 2023

Useful 1 Share



Aug 8, 2023

### Healthier Hair

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We encourage constructive feedback

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We advocate against bias

Take a closer look

Advertisement





I started using the MDhair line about 2 1/2 months ago as I have really thin hair that has also been falling out like crazy. Your 1st shipment will contain shampoo, hair serum and some supplements. The bottles are smaller than regular shampoo bottles but that is because you only have to use a small amount of the product. I shampoo the top of my head, put conditioner on the ends then let the products do their job while I continue showering. After 5 minutes, I rinse. Since I have been using the products, I can tell a noticeable difference in the amount of hair falling out. I have less hair shedding and my hair looks and feels healthier. I was a bit skeptical when I first heard about the products, but now I am hooked! I highly recommend this product to anyone experiencing hair loss and thinning. Try it, you won't be disappointed.

Date of experience: August 08, 2023

Useful 1 Share



Lyndsay McClellan

1 review US



Aug 3, 2023

### MDHair Conditioner

I've been using the MD Hair conditioner along with my subscription box and my hair has never felt better. I've always struggled finding a conditioner that feels great and also gets rid of the knots that I have even when I get out of the shower. 6 weeks in and I've seen a decline in shedding!

Date of experience: August 03, 2023

Useful 1 Share



Lisa T

1 review NZ



Aug 7, 2023

### Amazing products which work!

Great products that work well and smell amazing. They don't have that harsh chemical smell of many other products. I have been using this for almost 3 months and right from the 1st week, I noticed a 90% decrease in hairfall and in the next few months, I noticed new hair growth where I part my hair. They don't leave a greasy residue in my hair either and my hair is also softer than ever. They ship worldwide too which is amazing!

Date of experience: August 07, 2023

Useful 1 Share



Simone Gallimore-Mcpherson

1 review VG



Aug 3, 2023

### My experience using the MDhair...

My experience using the MDhair treatment has been a great help for my hair. Thus far my hair is manageable and not as dry and brittle as before. This is truly a breakthrough for me because over the years I have tried so many other products and they did not help, and for that reason it cause severe damage of my hair. I am very hopeful and grateful I came across this product. Looking forward to a bright and successful hair growth. Thanks MDHAIR!!!!

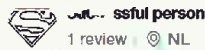
Date of experience: July 22, 2023

Useful 1 Share



Advertisement





ssful person  
1 review NL



Jul 14, 2023

### MD hair products are amazing

MD hair is an amazing company with great products, the hair serums have saved my hair. I currently use the shampoo and the restore serum in the morning after drying my hair and the regrowth serum in the evening and the results have been great. I live in the Netherlands and I am really happy I have discovered them. Lovely customer service too! Kind regards Iris

Date of experience: July 14, 2023

Useful 1 Share



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JU Julie  
16 reviews GB



Jul 21, 2023

### My hair was falling out I could do...

My hair was falling out I could do nothing with it. Then I found MD Hair. I was doubtful at first but gave it a try in December 22. So far the results are good. When my daughter trimmed my hair she had noticed a difference and I noticed my hair is growing back in my own colour. Also my eyelashes, eyebrows and my fingernails have improved too. My next treatment is to thicken my hair so I'm looking forward to the results. Would recommend give MD Hair a try.

Date of experience: July 21, 2023

Useful 1 Share



KS KSM  
1 review US



Jun 23, 2023

### These products work!

I've been using the hair restore serum and supplement formula for just over a month and I've seen a very significant improvement. I'm 63 with a full head of hair, but began to notice thinning at the part and crown, a thinner ponytail and a truly alarming amount of hair shedding when combing. I was picking hair strands off my clothing all day too. I'd say the shedding has reduced by 70% or more so far, and the scalp at the part line isn't as visible. Success!

Date of experience: June 23, 2023

Useful 1 Share



Dr. Kayla Lucas  
1 review CA



Jul 12, 2023

### I've had a good experience working with...

I've had a good experience working with MD Hair. Very responsive to emails and are good communicators. The product itself is helping my hair grow. I've had really severe postpartum hair loss and I've done it all. I take the supplements and use the hair care system. I've been using it now for about 3 months and it's going well. Excited to see how much more growth comes in.

Date of experience: July 12, 2023

Useful 1 Share



Roshni Amrat Singh Singh  
RA  
2 reviews CA



Jul 2, 2023

**Great Hair Products**

I have been battling with thinning hair for many years. I have been using MD Hair products for a few months now and am very happy with the results. The customer service team is professional and always respond to my questions timeously. They check up on me as a courtesy which is great. Using these products and seeing the results has definitely boosted my self confidence.

**Date of experience:** July 02, 2023

Useful 1 Share



The Super Sophia Project  
1 review CA



Jun 29, 2023

**I absolutely love mdhair!**

I absolutely love mdhair. I have been using the system for a year and my hair has grown back. I was shedding like crazy and my hair line was embarrassing. I have been taking the daily vitamin along with using the shampoo and serum. I highly recommend mdhair as well as staying positive and believing.

**Date of experience:** June 28, 2023

Useful 1 Share



Daniel Dang  
1 review CA



Jul 30, 2023

**Very good product**

Very good product. I've used it for 3 months and have seen improvement on my hair growth and reduction in hair loss. Looking forward to the next progress.

**Date of experience:** July 30, 2023

Useful 1 Share



Sarah Harris  
2 reviews GB



Jun 18, 2023

**Highly recommend**

I have been using the shampoo, conditioner and serum for the last 6 months and I absolutely love it. Even my husband has noticed my hair looking thicker. The conditioner is wonderful, I use the tiniest amount and massage it into my scalp and I can distribute it throughout all of my hair. My hair has never looked or felt healthier. I will 100% be continuing with my treatment.

**Date of experience:** June 18, 2023

Useful 1 Share



## Let's Find Your Fragrance

**AN** Anna  
1 review US



Jun 11, 2023

### Their customer service is TOP NOTCH

Their customer service is beyond stellar. Everyone has been so patient and understanding with all of my questions and concerns. The items that have been suggested for my kit have been wonderful. Their Restore Shampoo has also made it possible for me to extend my hair coloring appointments. It has been over 6 months, and my hair is still less than 50% gray. Typically, after 3 months, I need to go back in for a touchup. My hair feels clean and thicker after I use their shampoo and conditioner. I still shed hair when I wash my hair but not the amount that I did when I used Nutrafol products.

Date of experience: June 11, 2023

Useful 1 Share



**Khushboo Panchal**  
1 review CA



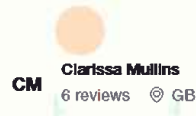
Jul 20, 2023

### I had a few thin hair on the sides of...

I had a few thin hair on the sides of my forehead and my hair fall was through the roof. I came across to MD hair while I was watching Tina Lee on YouTube. I immediately tried the quiz and ordered my first subscription. I now have my second one in my house and I am so happy I ordered. My hair feels thick, the hair fall has reduced a LOT and my so called bald spot has hair now Very happy with the results.

Date of experience: July 20, 2023

Useful 1 Share



**Clarissa Mullins**  
6 reviews GB



May 30, 2023

### MDHair has been wonderful

MDHair has been wonderful. Their staff really works with you to get to the source of the problems and their products actually treat those problems. I've seen less hair loss and shedding so far but am early on in my treatment and am looking forward to the regrowth phase.

Date of experience: May 30, 2023

Useful Share



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## MDacne

Reviews 948 • Great

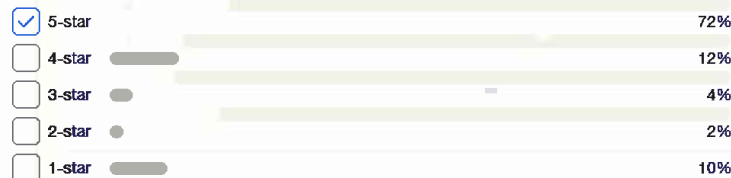


4.0 ⓘ



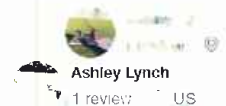
### Reviews ★ 4.0

948 total



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Ashley Lynch

1 review • US



2 days ago

#### One of the 1st skin regime I had...

One of the 1st skin regime I had actually work! I am in love with these products and am so thankful for MDacne! They have came out with a specialized personalized to our skin which makes a huge difference for us as customers! I recommend anyone who is sick and tired of wasting money on tons of skincare products and dermatology and facials with no success or short term results. Try this product!!

Date of experience: August 01, 2023

Useful Share



Monika Kelly

1 review • CA



Aug 14, 2023

#### A must try!

My MDacne experience has been great. Customer service is awesome, I love the advice I've received so far. Products have been great, I love the simplicity of the routine yet it's very effective.

Date of experience: August 14, 2023

Useful Share



Maribel Montoya

1 review • US

[www.mdacne.com](#)

Visit this website

### Company activity

[See all](#)

Claimed profile

Replied to 1 out of 36 negative reviews

Replies to negative reviews in &lt; 24 hours

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### About MDacne

Information written by the company

#1 Acne app for analyzing acne prone skin. Real-time information about acne type and severity together with a custom personal acne treatment plan.

### Contact

 @ [support@mdacne.com](mailto:support@mdacne.com)

 San Francisco  
United States

### Category ⓘ

[Beauty Product Supplier](#)

### The Trustpilot Experience

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We champion verified reviews

We fight fake reviews



Aug 19, 2023

### I love MDacne products!

I love MDacne products!! It's amazing for my face, and the way I feel after washing my face is incredibly amazing!!! And there videos on how much to apply, and how to do it is really awesome of them! I love MDacne, and if your not trying it you really should!

Date of experience: August 19, 2023

Useful Share



**RY** Rylee  
1 review US



Aug 18, 2023

### good results

i can see a distinct difference in my skin. i started off with really bad acne and scaring and its gotten so much better.

Date of experience: August 18, 2023

Useful Share



**Arnaud Rodney**  
1 review US



Aug 11, 2023

### I've been using Md acne almost 2 years...

I've been using Md acne almost 2 years now and it's one of the best thing that I could have done for my skin. Yes of course in the beginning you'll have a purging stage but after that purging stage the treatment make wonders.

Date of experience: August 11, 2023

Useful 1 Share



**MW** Mark Watt  
1 review GB



Aug 8, 2023

### MDAcne - Great Products

The service provided has been great , the treatment cream , moisturiser , cleanser and shave cream have worked well for me , it's taking a bit of time for my skin to get used to the products but now I'm starting to see benefits from them. Would highly recommend.

Date of experience: August 08, 2023

Useful 1 Share



**Charlene Gardner**  
1 review US



Jul 3, 2023

### I have struggled with ance so long

I have struggled with ance so long. So I saw this ad on Facebook and read the reviews. I tried everything else so why not. So it came really fast because they were offering a trial just pay shipping. The trial was large than I expected. So I tried it, the next morning I was like my mind is playing tricks because my skin looked really smooth and clear. Then later that day my sister complemented on how clear my skin looked. I can't wait to see how my skin will look with continued use.

Date of experience: July 04, 2023

Useful 1 Share

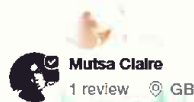
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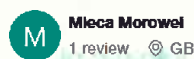
Jun 19, 2023

**Thankyou MDacne!**

I've just read some of these reviews and all I can say is wow, I guess everyone's experience is different. I started using MDacne about a month ago and I was abit skeptical but I thought let me give it a try. At first it seemed like nothing was happening but you've got to be patient with these things as you're not going to see overnight results. Slowly but surely I began to see results and my acne is really clearing up. I use the products every day as direct with my own moisturiser and sun cream too! Please remember that this is more of a subscription per se, so don't be surprised when the money is taken every month - I was caught off guard the first time but I've altered the date I'm going to get charged. Thankyou to the creators of MDacne, you're really doing a good job! I'm sorry to those who have had a bad experience but still if you're yet to try the products, give it a go and see. Also this is a genuine review - I'm not a bot or anything, I'm a real person just giving my honest opinion on MDacne!

Date of experience: June 19, 2023

Useful 1
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Mar 7, 2023

**Genuinely worked so perfectly for my...**

Genuinely worked so perfectly for my skin. I've tried quite a few and they were good but I think this one did the magic. Eating better and drinking loads of water per day, my skin has become much better. Sometimes I feel the dryness after washing my face but I literally don't mind it. It's not tooo dry and with the facial cream plus any suitable cream, you'll be fine. It's definitely a 5 star for me! I personally started seeing results from the first day!!!!

Date of experience: March 08, 2023

Useful 1
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Apr 18, 2023

**Within only a week of using my...**

Within only a week of using my customized treatment, it has reduced my redness, as well as got my excessive oily skin under control. Not leaving me too dried out at the same time.

Date of experience: April 18, 2023

Useful 1
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Aug 12, 2022

**THE GOT THE RECIPES**

We all know how going anywhere with breakouts are simply THE WORST!!!  
 First Off...WHO EVER MADE THIS LIQUID GOLD FOR-SURE KNOWS THE SECRET  
 FORMULA TO THE " CRABBY PATTY" I CANNOT TELL YOU HOW MANY  
 DERMATOLOGIST I HAVE SEEN FACE TO FACE THAT GAVE ME THE WRONG  
 STUFF !!!! tragic MADE EVERYTHING WORST!!!! THIS TEAM OF DERMATOLOGIST  
 GOT MY WHOLE VIBE TOGETHER OVER AN APP makes me wonder WHY DID I  
 WAIT SO LONG!!!

SINCERELY, A clear FACE FRIEND!!! thank you so much seriously

Date of experience: August 12, 2022

👍 Useful 1 🔄 Share



**Nikki m**

1 review 🌐 GB



Feb 19, 2023

**Amazing!!!**

It is very easy to use, it works so well and the ingredients used are proven to work. I have an ongoing issue with acne but it cleared up so well!!! However I am on the contraceptive implant so I do break out often, but because of these creams, it's made it very minimal and if I weren't using them, it would be so different.

Date of experience: February 19, 2023

👍 Useful 1 🔄 Share



**Omokaro Elizabeth**

2 reviews 🌐 NG



Jun 26, 2022

**My Skin clearing Angel.MDacne**

I started this journey of skin clearing with MD acne having mixed feeling because I had continuous abortive treatments with almost all the so called acne treatments I had come across and so I met MDacne. I tried the product by 'faith' and almost gave up at some points because it appeared to be getting worst at first but with patience I continued also the daily routine reminders were good to remind me and suddenly I realised I was looking good. My skin was cleaner and smoother. Kisses and hugs to the team.

Date of experience: June 26, 2022

👍 Useful 1 🔄 Share



**Nina**

6 reviews 🌐 GB



May 14, 2023

**Absolutely brilliant**

Absolutely brilliant! I cannot recommend MDacne enough! I used to have severe acne until I started using the customised products they sent me. In under a month my skin is nearly clear.

Date of experience: April 22, 2023

👍 Useful 1 🔄 Share



**Maryn Ksy**

1 review 🌐 US



Apr 27, 2023

**This skin supplements helped to reduce...**

This skin supplements helped to reduce my acne and also black spot The only thing

was that during my first two weeks I felt uncomfortable swallowing the pills but I became used to it later

Date of experience: March 21, 2023

Useful 1 Share



DE

Dominion Ebeye

2 reviews GB



Oct 7, 2022

### Lovely products

It's been roughly a week since I started using MDacne treatment. My skin seems to be going back to normal. It's happening way faster than expected cos it says you should expect improvement after 2 - 4 weeks. If you're looking for something effective try it out and the fact that the first set is pretty Free is amazing. Thanks MDacne.

Date of experience: October 06, 2022

Useful 1 Share



DK

Diksha Kamboj

1 review AU



Jul 4, 2022

### I remember when i started the...

I remember when i started the treatment, after applying every single product online and still not satisfied. I lost so much confidence. And then mdacne helped to gain my confidence back. Feeling so much better now. Massive difference and very highly educated nurses online advising after assessment. So happy :)

Date of experience: July 04, 2022

Useful 1 Share



Scott Kunze

2 reviews US



Aug 16, 2022

### I tried out their shaving Cream after...

I tried out their shaving Cream after Neutrogena discontinued their skin clearing formula. This product is every bit as good as the Neutrogena equivalent, if not better. Right away I was getting less bumps and break outs. I use this with a safety razor and just a little can cover your whole face.

Date of experience: August 16, 2022

Useful 1 Share



RF

Rozella Fall

1 review US



May 5, 2022

### MDacne is awesome

MDacne has been a great experience so far. I've tried other online acne prescriptions and they never went out of their way like the team at MDacne does. They check in on you weekly, actually look at your progress photos, and adjust your shipments based on how your face is looking. I definitely recommend them to anyone who's looking for a good acne treatment. 10/10 awesome service.

Date of experience: May 06, 2022

Useful 1 Share



KA

KAREN

2 reviews GB



Oct 20, 2022

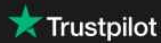
### My troubled skin journey is finally over...

My troubled skin journey is finally over and it's been so easy! It's such a relief to have normal skin after a year of really bad acne, the frustration of failed treatments, and expensive medications/creams. My skin started to clear as I go on using the customised treatments from MDacne. MDacne's sulfur treatment cream has truly changed my skin. Its so easy to use & apply and truly you could see guaranteed results as fast as 2weeks.

This is by far the best product I have ever tried of any kind, in my LIFE 🙌 Thanks a lot MDacne 😊

**Date of experience:** October 20, 2022

👍 Useful 1    🔗 Share


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